

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**DECLARATION OF RACHEL B.  
ABRAMS IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

I, Rachel B. Abrams, declare:

1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway & Wise, LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
[Partially Redacted] Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit A to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit B to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber

Exhibit D [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S- RAD Issues	References to information deemed confidential	Uber
Exhibit E [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S- RAD Issues	References to information deemed confidential	Uber
Exhibit F [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S- RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit H to Joint PTO 8 Letter Regarding Outstanding S- RAD Issues	References to information deemed confidential	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24<sup>th</sup> day of September, 2024 in San Francisco, California.

/s/ Rachel B. Abrams  
Rachel B. Abrams